



## U.S. Environmental Protection Agency

Region I New England  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

DEC 10 2015

Frederick Chisolm, Plant Manager  
Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561

Re: Request for Information Pursuant to Section 308 of the Clean Water Act  
(33 U.S.C. § 1318), Docket No. CWA-308-R01-FY16-52.

Dear Mr. Chisolm:

Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C. § 1318(a), authorizes the U.S. Environmental Protection Agency (the "EPA") to require any owner or operator of a point source to provide information needed to determine whether there has been a violation of the Act.

Hubbell FCI-Burndy LLC located at 150 Burndy Road in Littleton, New Hampshire (hereafter referred to as "the Facility" and or "FCI") is hereby required, pursuant to Section 308(a) of the Act, 33 U.S.C. § 1318(a) to respond to this Request for Information (the "Request") within 45 calendar days of receipt of this letter. Please read the instructions in Attachment A carefully before preparing your response and answer each question in Attachment B as clearly and completely as possible. In addition, this Request directs FCI to begin monitoring, within ten (10) calendar days of receipt of this letter, all process wastewaters introduced into the Town of Littleton's Publicly Owned Treatment Works from FCI in accordance with the sampling program outlined in Attachment C.

Your response to this Request must also be accompanied by a certificate that is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Attachment D, is attached to this letter. Information submitted pursuant to this Request shall be sent by certified mail, and shall be addressed as follows:

United States Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
Attention: Joseph Canzano, OES04-4

Compliance with this Request is mandatory, and failure to respond fully and truthfully or to adequately justify any failure to respond within the time frame specified above also constitutes

a violation of the Clean Water Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

The Small Business Regulatory Enforcement and Fairness Act ("SBREFA") provides small businesses the opportunity to submit comments on regulatory enforcement at the time of an EPA enforcement action. The enclosed Information Sheet contains information regarding their rights, and describes compliance assistance that may be available to you. The Small Business Ombudsman may be reached at 1-800-368-5888. EPA routinely provides this information to businesses whether or not they qualify as small businesses, as defined by the Small Business Administration. Please be aware that availing yourself of this opportunity does not relieve your facility of its responsibility to comply with applicable federal and state laws and regulations.

FCI may assert a business confidentiality claim with respect to part or all of the information submitted to EPA in the manner described at 40 C.F.R. §2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA, the information may be made available to the public by EPA without further notice to FCI.

As you know, on November 17, 2015, the EPA performed an inspection at FCI. The purpose of the inspection was to observe, among other things, unit operations which generate wastewater discharges in relation to EPA's General Pretreatment Regulations at 40 C.F.R. Part 403, and Metal Finishing Regulations at 40 C.F.R. Part 433. The EPA also inspected the Facility oil storage and transfer activities under EPA's Oil Pollution Prevention Regulations at 40 C.F.R. Part 113, and stormwater runoff under EPA's Stormwater Regulations at 40 C.F.R. Part 122. Comments associated with EPA's observations are included in Attachment E.

If you have any technical questions regarding this Request or the comments in Attachment E, please contact Joseph Canzano of my staff at 617-918-1763, and for legal questions please have your attorney contact Kevin Pechulis at 617-918-1612.

Sincerely,



James Chow, Manager  
Technical Enforcement Office  
Office of Environmental Stewardship

Enclosures

cc: Andrew Dorsett, Town of Littleton  
Alex Rastorguyeff, NH-DES  
Joy Hilton, EPA

## **Attachment A**

### **Instructions**

**Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561**

1. Provide a separate narrative response to each and every question and subpart of a question set forth in this Request. Precede each answer with the text and the number of the question and the subpart to which the answer corresponds.
2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, explain.
3. Any documents referenced or relied upon by you to answer any of the questions in the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses.
4. If information or documents not known or not available to you as of the date of the submission of the response to this Request should later become known, or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is inaccurate or incomplete, you must notify the EPA of this finding as soon as possible and provide a corrected response.





## **Attachment B**

### **Questions**

**Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561**

1. General Business and Ownership Information Questions:
  - a. Specify the full legal name(s) with exact spelling, the business mailing address, and telephone number, and address for FCI. If incorporated, specify the state of incorporation and the principal place of business. If a partnership, provide the names and addresses of all the partners. If FCI has a parent company, list the parent name and address.
  - b. Provide a flow chart/diagram that shows the corporate and management structure of FCI, its parent company, and its subsidiaries. Identify who has responsibility for environmental compliance.
2. Wastewater Discharge Questions:

Provide the following information, in detail, for FCI's facility located at 150 Burndy Road, Littleton, New Hampshire:

- a. All processes<sup>1</sup> and sub-processes conducted at the facility and the dates those processes/sub-processes were conducted during the period from January 1, 2010 to the present. This includes, but is not limited to, processes which produce electrical connectors, tools, and grounding cables, and any other manufacturing operations associated with manufacture of electrical connectors, tools, and grounding cables.
- b. The date(s) when each process began and the date(s) when each process began introducing wastewaters into the Town of Littleton's Publicly Owned Treatment Works (the "POTW").
- c. Explain how each waste stream<sup>2</sup> is discharged to the POTW as defined at 40 C.F.R. § 403.3(q). This shall include, but not be limited to, wastewaters that are transported by truck to the POTW, or otherwise discharged to any other location.

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<sup>1</sup> Hereinafter, the term "process(es)" shall mean unit operation(s) performed at the Facility and the term "sub-process(es)" shall mean the individual steps or activities that, taken together, make up the process(es).

<sup>2</sup> Hereinafter, the term "waste stream" shall mean any waste water discharge from any process or sub-process source.

- d. Submit a detailed process flow diagram ("PFD") showing present day configuration of the facility's manufacturing processes, and any changes to the facility since January 1, 2010. Indicate on the PFD, next to the change, the date of any changes, and the following:

- (1) All process, sub-process, and non-process wastewater sources. This includes, but is not limited to, machining, grinding, brazing, solvent degreasing, barrel/tumble finishing, washing, cleaning and rinsing of metal parts. Also include any recycled waters, contact and noncontact cooling waters, stormwaters, roof drains and floor drains, sanitary facilities and cooling tower waters, backwash and reject waters, and boiler blow-down and floor and equipment cleaning operations. Clearly label all sources, and indicate whether the source is continuously or batch discharged.

For processes that discharge on a continuous basis, provide the daily maximum and monthly average flow rate (in gallons per day), and the manner in which the rate is calculated. For processes that batch discharge (if applicable) provide the average daily volume (in gallons) of each batch, the frequency over the production day for the batch discharge, and the manner in which the rate is calculated.

- (2) For each process operation, list all chemicals used and indicate the primary purpose for the chemicals and operation. Indicate process bath mixture/solution concentrations, life expectancy and/or recharge frequency for baths, and method for disposing of solutions. Clearly illustrate on the PFD the location for chemicals used, i.e., which baths contain chemicals.
- (3) For the metal parts cleaning operations which discharge wastewaters to the POTW, indicate the type of chemical(s) used in the operation if not already provided, daily feed rate for metal parts moving through the operation (in pounds per day), and wastewater discharge rate through the rinse tank that follows the cleaning operation to the POTW (in gallons per day).
- (4) All wastewater sources that are subject to any Pretreatment Standards, as defined at 40 C.F.R. § 403.3(l). Also indicate any wastewater sources that are not regulated or permitted. In those instances where a source for a discharge is unknown, FCI shall conduct an investigation to determine the source.
- (5) All wastewater treatment facilities<sup>3</sup>. Illustrate wastewater directional

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<sup>3</sup> Hereinafter, the term "treatment facilities" shall include all wastewater treatment, collection pits, sumps, tanks, and



flows from all sources to treatment and to the POTW and surface waters. Clearly illustrate which sources flow through treatment facilities and which sources do not, and all treatment system structures that are located prior to connection with the POTW (e.g., manholes, pipes, tanks, floor trenches, and pits).

- (6) The exact location(s) at which wastewater sampling is collected for measuring wastewater pollutants introduced into the POTW required by state or local permits.
- (7) The exact location at which wastewater flow rate, hydrogen ion concentration ("pH") monitoring devices (i.e., probes, meters, etc.) and any other wastewater discharge monitor and metering is located, type(s) of devices used (make, model and year), control set point(s) for the devices, and the purpose of the devices.
- (8) The location at which sanitary and process waste streams connect into the POTW.

State the date(s) the treatment and monitoring facilities were installed and placed into service. If FCI has added or changed equipment from the original facilities between January 1, 2010 and the present, provide an itemized list of the changes organized chronologically. Changes include, but are not limited to, addition of tanks, chemical feed pumps and/or filters.

- e. Specify the time it takes (in minutes) for industrial process wastewaters from FCI's facility to reach the Town's wastewater treatment plant's head-works, and provide a table that contains the total monthly volume (in gallons) for process wastewaters discharged to the POTW for the period from January 1, 2010 to the present.
- f. Provide a statement that addresses whether industrial process wastewater discharges from FCI's treatment facilities currently meet, and have ever violated, all applicable local, state, and federal wastewater requirements, specifically the general prohibition regulation found at 40 C.F.R. § 403.5, and whether FCI has complied with the notice of potential problems, including slug loading, regulation found at 40 C.F.R. § 403.12(f). If FCI discovers the discharges do not currently meet applicable local, state or federal wastewater requirements, specify what additional treatment, or operation and maintenance changes are necessary to meet applicable requirements. If additional treatment, operation or maintenance is required, describe in detail what actions will be taken, the date(s) and the action(s) that will be taken, and an actual or estimated total cost (engineering, material and labor) for the action(s).

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*all associated piping, pumps, meters, and probes.*

- g. Identify and list all waste streams that have been eliminated or ceased being discharged to the POTW between January 1, 2010 and the present. Include the date(s) on which the waste stream(s) started and stopped being discharged and the location and volume (in gallons) of the waste stream(s) that were previously discharged to the POTW.
- h. Provide a list of changes and modifications the facility has made since January 1, 2010, or intends to make for processes that discharge copper-bearing wastewaters to the POTW. When providing the list, be as specific as possible, e.g., installation of a second stagnant rinse tank, reducing metals drag-out to the rinse tank for the cleaning tank by spray washing parts over the cleaning tank prior to moving parts into the rinse tank, etc.
- i. Provide, in chronological order, all correspondence, including e-mails, sent by or received by FCI to or from the Town of Littleton or the POTW, or to or from the New Hampshire Department of Environmental Services ("DES") from January 1, 2010 to the present regarding FCI's discharges of industrial process wastewaters into the POTW or to any other location, compliance with FCI's industrial user permit issued by the Town of Littleton or the Town of Littleton's sewer use rules and regulations, or DES and EPA's industrial wastewater discharge regulations.
- j. Submit legible copies of all sampling and analysis reports for wastewaters monitored by FCI from January 1, 2010, to the present. Your response shall contain a table which contains all analytical results, expressed in milligrams per liter ("mg/l"), for total copper and total volume (in gallons) for wastewater discharges, and be organized chronologically from January 1, 2010, to the present. If not indicated on the sampling or analysis reports, FCI shall note the following:
  - (1) The sample type (i.e., composite or grab).
  - (2) The date and time on which the sample was collected, the date on which it was analyzed, and the exact location from where the sample was collected.
  - (3) The total amount of discharge to the POTW over the sample day.
  - (4) Amount of product (in pounds) moving through process tanks that discharge to the POTW over the sampling day.
- k. Submit all correspondence, engineering plans, e-mails or other information outlining actions taken or to be taken to achieve compliance with local, state or federal wastewater discharge requirements.

End of Questions



## **Attachment C**

### **Wastewater Monitoring Request**

**Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561**

#### **Process Water Discharges:**

1. Within ten (10) calendar days of receipt of this letter, begin monitoring and reporting for hydrogen ion concentration ("pH"), total copper, and flow rate for wastewaters discharged to the Town of Littleton's POTW.
2. For total copper, sampling and analyses shall be performed three days per week for the first four weeks, followed by once per month until instructed otherwise. Effluent monitoring results required in paragraph 6 below shall be submitted within seven (7) calendar days of FCI receiving the results from its contract laboratory.
3. Report daily amount of copper and other metal products (in pounds of metal) and moving through the Facility's wash/cleaner tank which discharges wastewaters to the POTW.
4. Report, on a monthly basis (if applicable) total volume (in gallons) of wastewaters transported off site for disposal. For wastewaters transported off site, submit copy of bill of lading or waste manifests.
5. Flows from the water rinse tank shall be continuously monitored for pH and be recorded on a continuous basis on a daily wheel chart and or equivalent recording system. On a monthly basis and until instructed otherwise, submit a report to EPA which includes a copy of the recorded pH results described below.

For all pH results that are recorded below 5.0 Standard Units ("S.U.") or above 12.5 S.U., provide a summary table. The table shall list, on a daily basis, every instance when wastewater pH results are below 5.0 S.U. or above 12.5 S.U. The table will also show the duration (in minutes) of each excursion, and the lowest and highest pH value recorded during the excursion. The table shall also include a detailed statement that explains the potential or actual cause of each excursion.

6. Effluent waste water monitoring reports shall contain the following information:
  - (a) date and time period over which the samples are collected;
  - (b) location where samples are taken;
  - (c) method of sample collection;
  - (d) analytical sample method;

- (e) flow rate recorded over the sample period at the sample point;
  - (f) pounds of product passing through each unit operation contributing flows over the sampling period;
  - (g) flow rate and/or pH probe calibration information; and
  - (h) a certification statement as outlined at 40 C.F.R. § 403.6(a)(2)(ii) signed by the appropriate signatory as defined at 40 C.F.R. § 403.12(l).
7. All sampling and analysis shall be performed in accordance with EPA approved test methods as set forth in 40 C.F.R. Part 136. Sampling must be conducted during normal operating and production hours, and simultaneously when FCI is operating and generating wastewaters.

Conduct the required sampling by collecting a 24-hour composite sample through time-proportional composite sampling techniques during periods of time when the discharge pump is activated and introducing wastewaters to the POTW.

**Attachment D**

**Statement of Certification**

**Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561**

Complete and Include With Your Response

I declare under penalty of perjury that I am authorized to respond on behalf of FCI. I certify that the foregoing responses and information submitted were prepared by me, or under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By \_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)





## **Attachment E**

### **Inspection Comments & Observations**

**Hubbell FCI-Burndy LLC  
150 Burndy Road  
Littleton, NH 03561**

On November 17 and 18, 2015, the EPA performed an inspection at the facility and observed, among other things, unit operations which generate industrial wastewater discharges to the sanitary sewer system, oil storage and transfer operations, industrial activities exposed to precipitation, and stormwater outfalls which convey stormwater off site to down gradient surface waters.

#### **Industrial Wastewater Discharges to the Town of Littleton's Publicly Owned Treatment Works ("POTW")**

According to facility personnel, copper, stainless and non-stainless steel, and aluminum stock is primarily used to manufacture electrical connectors, tools, and grounding cables for the power and energy sector. Certain manufacturing operations generate industrial process wastewaters, and after those operations (i.e., machining, grinding, brazing, solvent degreasing, barrel/tumble finishing, testing and assembly) parts are placed in a washing and cleaning operation to remove solids, oils and grease. In addition, production floor washing also generates wastewaters.

Wastewaters from production floor cleaning and/or parts washing and cleaning operations are collected in two 1,200 gallon storage tanks and shipped off-site, or discharged into the POTW. According to facility personnel production floor cleaning wastewaters contain elevated amounts of copper and is no longer, as of July 2015, discharged to the POTW. Industrial process wastewaters introduced into the POTW do not undergo metals reduction treatment.

Regarding parts washing and cleaning wastewaters introduced into the POTW, an operator loads metal parts into baskets which are placed in a rack<sup>1</sup> system which is then immersed in a heated "wash/cleaner tank" that contains a water and chemical solution, i.e., Aquaease PL 732. After some time, the operator removes the rack from the wash/cleaner tank and moves it into a continuous flow "water rinse tank". On November 17, 2015, a total of 3,708 pounds of metal moved through the wash/clean tank and the water rinse tank. At the time of the inspection, the hydrogen ion concentration ("pH") for the solution in the wash/clean tank was between 9.0 and 10.0 Standard Units ("S.U."), while the pH for the water in the water rinse tank was between 6.0 and 7.0 S.U. The manufactures product bulletin<sup>2</sup> for Aquaease PL 732 describes the chemical as a mildly alkaline product that may be used to clean, among other metals, copper and aluminum alloys, and "generally will not etch highly polished surfaces." The bulletin's operating parameter for the chemical suggests 1% to 10% (volume) optimum 4%

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<sup>1</sup> Six baskets per rack, each rack hold up to 35 pounds of metal parts, maximum rack batch is 210 pounds.

<sup>2</sup> Hubbard-Hall, Product Code 2053011, Date 11/30/10.

to 5% (volume) for most applications. At the time of the inspection facility personnel did not know the operating parameter or the amount of time parts are immersed in the wash/cleaner tank. To reduce the amount of copper and other metals in the final discharge to the POTW, EPA's inspector recommended reducing drag-out solution from the wash/cleaner tank to the water rinse tank by spraying/rinsing parts over the wash/cleaner tank before moving racks into the rinse tank, and or alternatively consider installing a second water rinse tank, e.g., stagnant/dead water rinse tank. According to facility personnel, the solution in the wash/cleaner tank is periodically changed and spent/waste solution is shipped off site for disposal.

Flows to the water rinse tank drain, by gravity, to a final "discharge tank", i.e., Outfall 001. Wastewaters from the discharge tank is ejected to the POTW by way of a float-activated submersible type pump. When the liquid level reaches a predetermined elevation in the final discharge tank the pump activates and ejects wastewaters ultimately to the POTW. At the time of the inspection, the pH for the solution in final discharge tank was between 6.0 and 7.0 S.U. Flow rate and pH for wastewaters introduced into the POTW is measured instantaneously using a digital totalizer and pH meter respectively. Effluent flows and pH data is not preserved to a recorder type system. EPA's inspector recommended the data be recorded and preserved.

According to certain documents provided to EPA at the time of the inspection, from August 17, 2015, through November 17, 2015, the facility transported off-site 7,030 gallons of wastewater, while from July 1, 2014, through December 30, 2014, the facility introduced 148,350 gallons (about 806 gallons per day) of wastewater into the POTW.

According to a January 23, 2015, letter from Utility Partners to the Town of Littleton, the average concentration for total copper introduced into the POTW from the facility from June 3, 2009, through November 20, 2014, is 2.26 milligrams per liter ("mg/l"), while on June 3, 2009, and December 29, 2010, total concentration for copper measured in the discharge into the POTW was 4.20 mg/l and 4.9 mg/l. The facility's industrial discharge permit ("IDP"), issued by the Town of Littleton on January 1, 2015, limits the total daily amount of process wastewater flow to the POTW to 1,200 gallons, and total daily maximum and monthly average copper concentration discharges to the POTW to 3.38 mg/l and 2.07 mg/l respectively.

During the inspection EPA collected a time-proportion composite wastewater sample from the final discharge tank, i.e., Outfall 001. Collection start date and time was November 17, 2015, at 1124, and end date was November 18, 2015, at 0755. Upon request, EPA will provide the facility with a copy of analytical results obtained by EPA's laboratory from EPA's sampler. At the time of the inspection EPA provided the facility with a split sample from EPA's composite sample.

### **Oil Spill Prevention, Control and Countermeasure ("SPCC")**

The facility's SPCC Plan ("the Plan") was developed in July 2003, and certified by a professional engineer registered in the State of New Hampshire on July 23, 2003<sup>3</sup>. The Plan was last reviewed and signed by management on February 12, 2013. According to Table 1 in the Plan the facility's total aboveground and below ground oil storage capacity is 7,523 gallons

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<sup>3</sup> *Walter Gancarz, Registration No. 8265.*



and 12,000 gallons respectively, and the largest single oil storage container is 1,200 gallons. The EPA has reviewed the Plan and offers the following comments:

- The Plan's site diagram, prepared by HRP Associates, is not accurate. During the site walk it was determined that the location and content for certain oil filled containers is not consistent with the facility's actual physical layout. For example, while oil filled transformers and compressors are narratively described in the Plan, the containers are not illustrated/identified on the site diagram. According to facility personnel, certain unit operations have been illuminated and/or substituted with new operations that contain regulated oil containers, and the diagram has not been amended to reflect the changes. Further, "Figure 1" in the Plan states "Site Map is contained in a separate file". The diagram/map shall be maintained in the Plan and not be a separate document, but may be developed as an integrated site diagram that satisfies the SPCC rule and industrial stormwater requirements.
- Sections 7.0 and 9.0 of the Plan identifies inspection and training requirements respectively. At the time of the inspection facility personnel did not provide records associated with conducting monthly tank, piping and containment inspections, and or employee training records for oil handling personnel.
- Section 13.0 of the Plan lists recommended measures to prevent oil spills during certain activates. During the inspection, facility personnel were not sure if the measures are being implemented.
- EPA recommends the Plan include (as an attachment) the Oil Pollution Prevention Regulations at 40 C.F.R. Part 112.

During the site walk EPA observed the following:

- Certain oil filled containers, including drums, do not have labels regarding oil content and or volume. For example, hydraulic oil tanks located in the Servits manufacturing department.
- A trench drain located in the facility's boiler room, and compressor and transformer dock may be connected to the sanitary sewer system.
- Manifold fill pipe for the (3) 1,200 gallon oil and wastewater storage tank do not include a back flow device.

### **Industrial Stormwater Discharges**

The facility's Stormwater Pollution Prevention Plan is dated June 5, 2009, (the "2009-SWPPP") and was signed by management on July 19, 2008.

According to EPA's records, on August 24, 2015, the facility reapplied for coverage under the EPA's June 4, 2015, National Pollutant Discharge Elimination System ("NPDES") Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (the

“2015-MSGP”). At the time of the inspection, facility representatives informed EPA’s inspector that the facility was in the process of amending its SWPPP. EPA reviewed the facility’s 2009-SWPPP and offers the following comments:

- The SWPPP did not specifically address pollution prevention controls and or procedures for oil or wastewater transfer operations to the Facility’s 12,000 gallon underground storage tank or (3) 1,200 gallon storage tanks for waste-oil and or process wastewaters.
- The SWPPP did not contain records for quarterly visual assessments for stormwaters discharged off the property.
- The SWPPP included a site map with a majority of the elements required by the permit, however the trash compactor and outdoor material storage area are not illustrated.
- The SWPPP did not explain control measures associated with outdoor material storage for cartons and an open roll-off dumpster.

During the site walk EPA observed the following:

- A rubbish roll-off container without a cover, wood boxes and pallets with potential to be exposed to precipitation.
- Certain area on the property where sediment and solids are accumulating and discharging off site. Solids deposit at the turn in the driveway just southeast of the delivery docks and closest to the trash compactor from sand and salt application from 2014-2015 winter season.
- Spilled absorbent material on the ground next to the trash compactor unit.



Attachment E  
Inspection Pictures and Comments

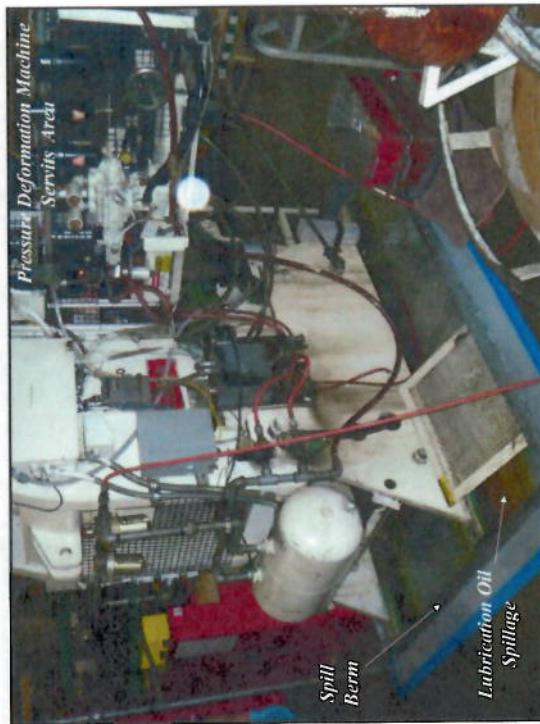
Hubbell Burndy LLC  
150 Burndy Road  
Littleton NH 03561

44° 18' 06" N  
71° 47' 37" W

USEPA Inspection 11/16/15













Servits Area



Pressure Deformation Machine  
Servits Area

Floor Washing Wastewaters



Floor Washing Wastewaters

Servits Area



Floor Washing Wastewaters  
330 Gallon Tote

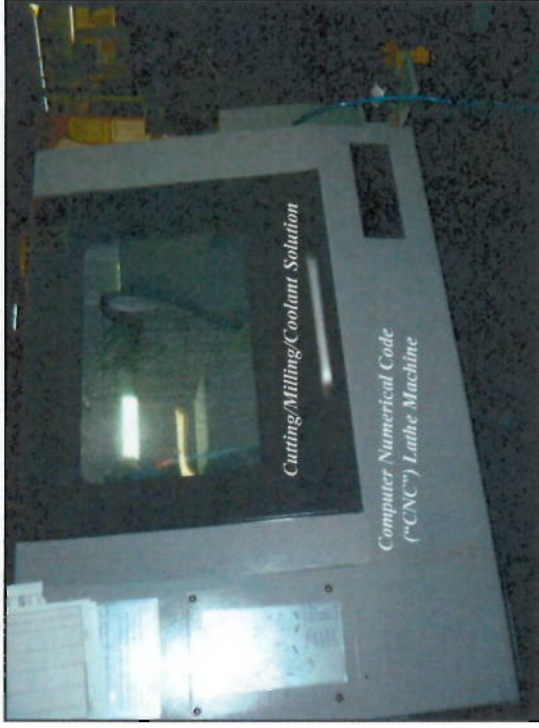
Servits Area





Lubrication, Cutting and Hydraulic  
Oil Drum Storage Area

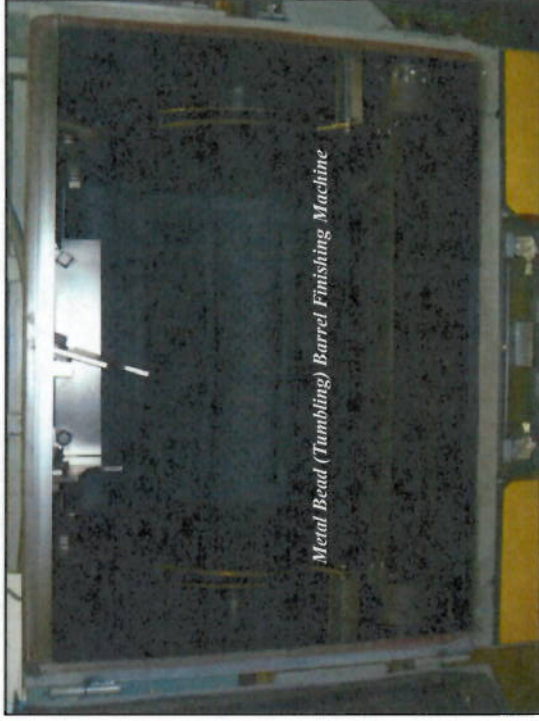
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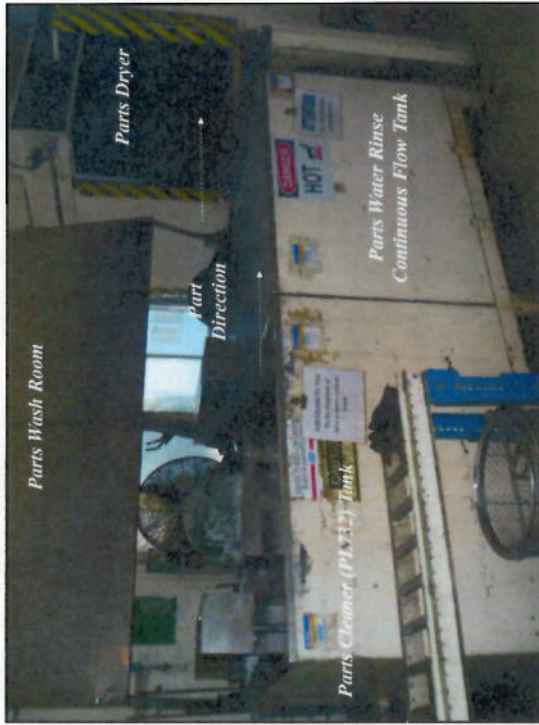
Oil & Chemical Drum Storage Room



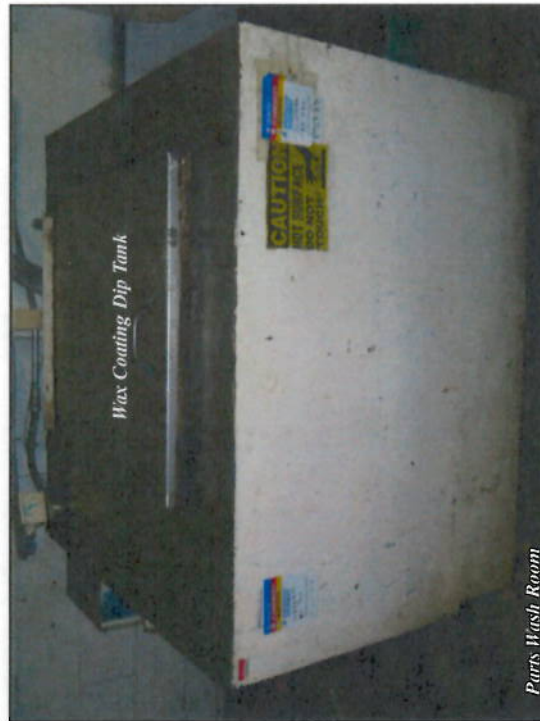
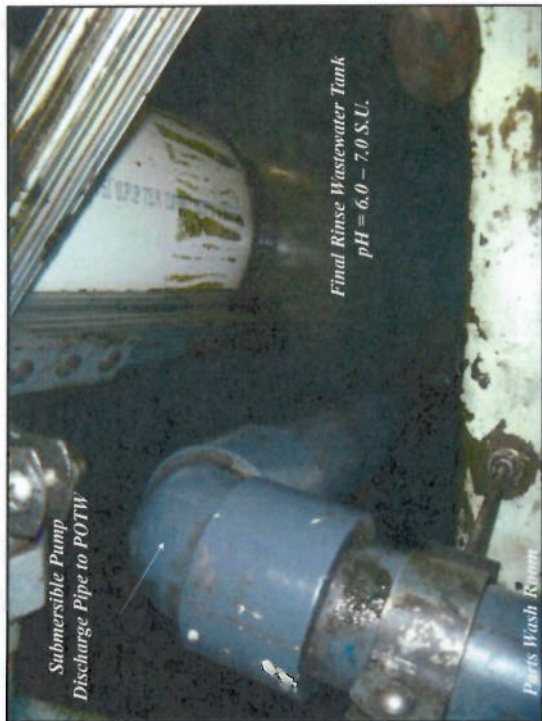
Oil & Chemical Drum Storage Room

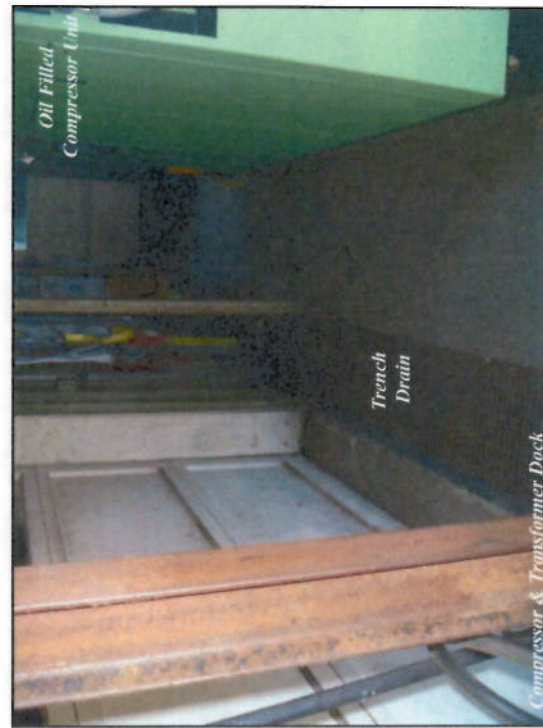




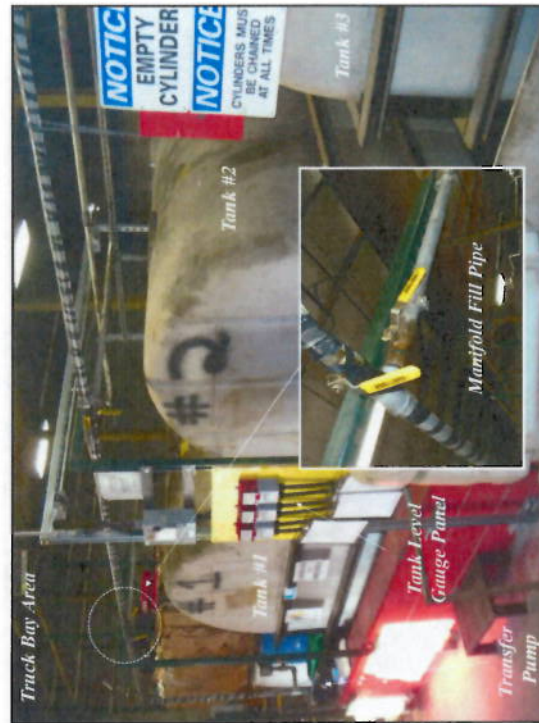




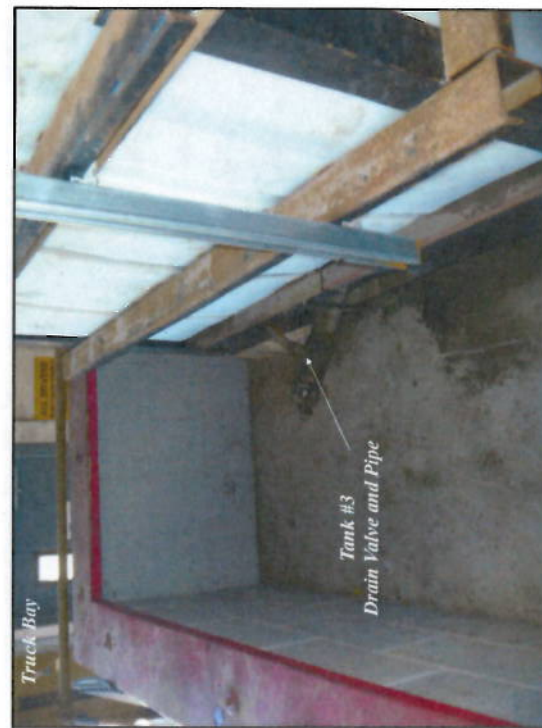
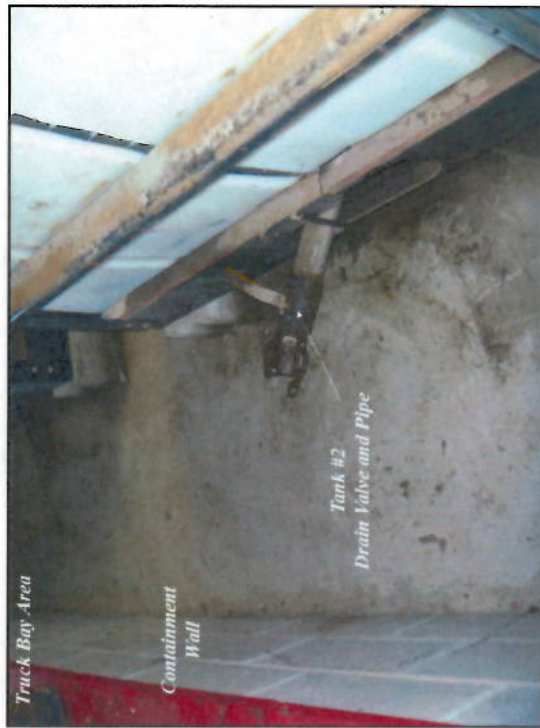
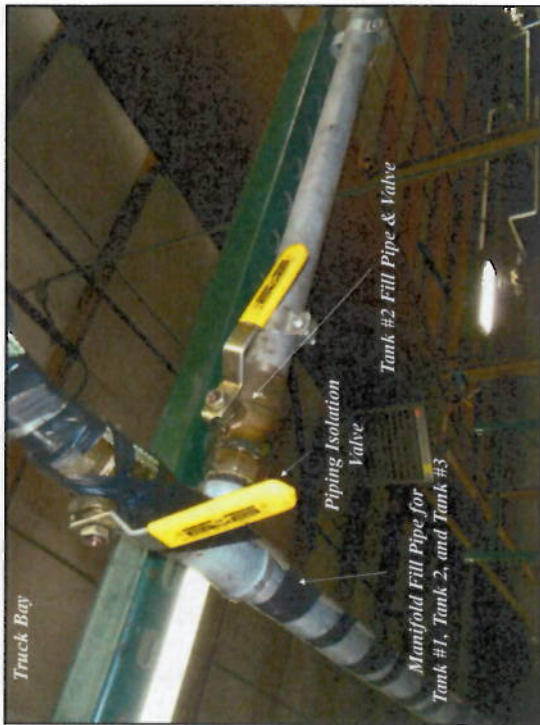


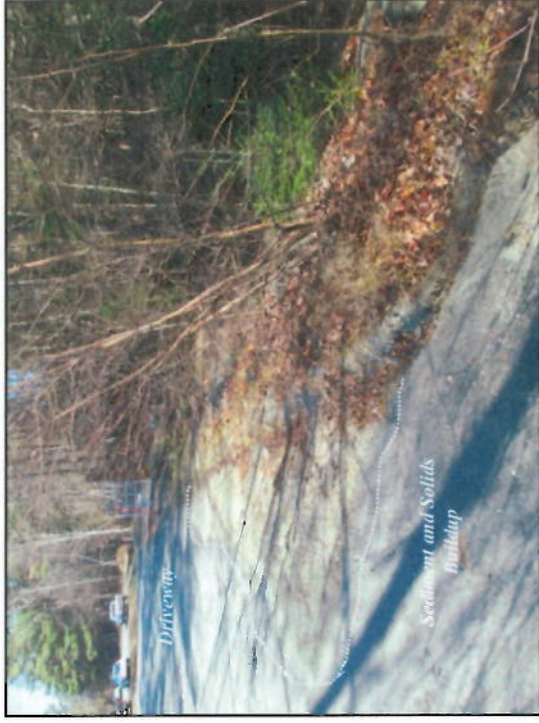
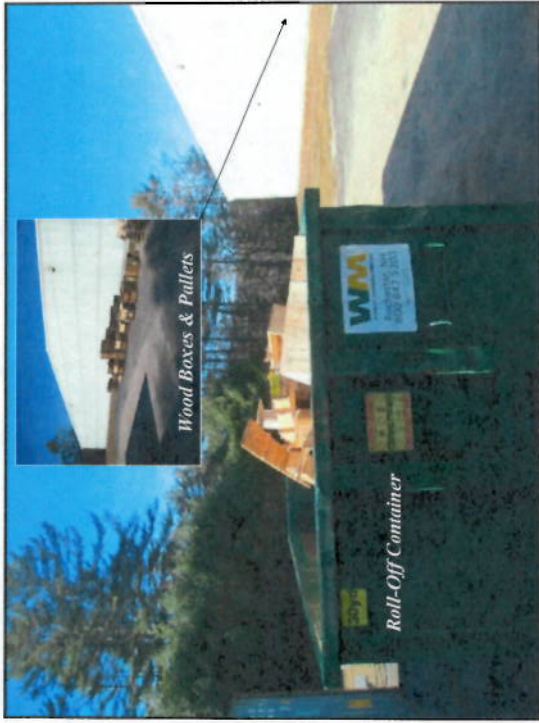




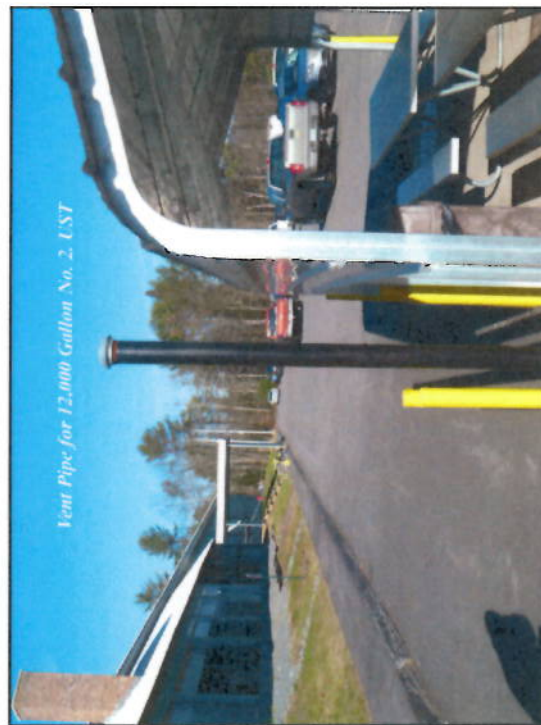


















## U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

### Small Business Programs

[www.epa.gov/smallbusiness](http://www.epa.gov/smallbusiness)  
EPA's Office of Small Business Programs (OSBP) advocates and fosters opportunities for direct and indirect partnerships, contracts, and sub-agreements for small businesses and socio-economically disadvantaged businesses.

### EPA's Asbestos Small Business Ombudsman

[www.epa.gov/sbo](http://www.epa.gov/sbo) or 1-800-368-5888  
The EPA Asbestos and Small Business Ombudsman (ASBO) serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

### EPA's Compliance Assistance Homepage

[www2.epa.gov/compliance](http://www2.epa.gov/compliance)  
This page is a gateway industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

### EPA's Compliance Assistance Centers

[www.assistancecenters.net](http://www.assistancecenters.net)  
EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

### Agriculture

[www.epa.gov/agriculture/](http://www.epa.gov/agriculture/)

### Automotive Recycling

[www.ecarcenter.org](http://www.ecarcenter.org)

### Automotive Service and Repair

[ccar-greenlink.org/](http://ccar-greenlink.org/) or 1-888-GRN-LINK

### Chemical Manufacturing

[www.chemalliance.org](http://www.chemalliance.org)

### Construction

[www.cicacenter.org](http://www.cicacenter.org) or 1-734-995-4911

### Education

[www.campuserc.org](http://www.campuserc.org)

### Food Processing

[www.fpeac.org](http://www.fpeac.org)

### Healthcare

[www.hercenter.org](http://www.hercenter.org)

### Local Government

[www.lgean.org](http://www.lgean.org)

### Metal Finishing

[www.nmfrc.org](http://www.nmfrc.org)

### Paints and Coatings

[www.paintcenter.org](http://www.paintcenter.org)

### Printing

[www.pneac.org](http://www.pneac.org)

### Ports

[www.portcompliance.org](http://www.portcompliance.org)

### Transportation

[www.tercenter.org](http://www.tercenter.org)

### U.S. Border Compliance and Import/Export Issues

[www.bordercenter.org](http://www.bordercenter.org)

### EPA Hotlines, Helplines and Clearinghouses

[www2.epa.gov/home/epa-hotlines](http://www2.epa.gov/home/epa-hotlines)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

### Clean Air Technology Center (CATC) Info-line

[www.epa.gov/ttn/catc](http://www.epa.gov/ttn/catc) or 1-919-541-0800

### Superfund, TRI, EPCRA, RMP and Oil Information Center

[www.epa.gov/superfund/contacts/infocenter/index.htm](http://www.epa.gov/superfund/contacts/infocenter/index.htm) or 1-800-424-9346

### EPA Imported Vehicles and Engines Public Helpline

[www.epa.gov/otaq/imports](http://www.epa.gov/otaq/imports) or 734-214-4100

### National Pesticide Information Center

[www.npic.orst.edu/](http://www.npic.orst.edu/) or 1-800-858-7378

### National Response Center

**Hotline** to report oil and hazardous substance spills - [www.nrc.uscg.mil](http://www.nrc.uscg.mil) or 1-800-424-8802

### Pollution Prevention Information Clearinghouse (PPIC) -

[www.epa.gov/opptintr/ppic](http://www.epa.gov/opptintr/ppic) or 1-202-566-0799

### Safe Drinking Water Hotline -

[www.epa.gov/drink/hotline/index.cfm](http://www.epa.gov/drink/hotline/index.cfm) or 1-800-426-4791



### Stratospheric Ozone Protection Hotline

[www.epa.gov/ozone/comments.htm](http://www.epa.gov/ozone/comments.htm) or 1-800-296-1996

### Toxic Substances Control Act (TSCA) Hotline

[tsc hotline@epa.gov](mailto:tsc hotline@epa.gov) or 1-202-554-1404

### Small Entity Compliance Guides

<http://www.epa.gov/sbrefa/compliance-guides.html>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

### Regional Small Business Liaisons

<http://www.epa.gov/sbo/rsbl.htm>

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

### State Resource Locators

[www.envcap.org/statetools](http://www.envcap.org/statetools)

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

### State Small Business Environmental Assistance Programs (SBEAPs)

[www.epa.gov/sbo/507program.htm](http://www.epa.gov/sbo/507program.htm)

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

### EPA's Tribal Portal

[www.epa.gov/tribalportal/](http://www.epa.gov/tribalportal/)

The Portal provides access to information on environmental issues, laws, and resources related to federally recognized tribes.

### EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

### EPA's Small Business Compliance Policy

[www2.epa.gov/enforcement/small-businesses-and-enforcement](http://www2.epa.gov/enforcement/small-businesses-and-enforcement)

This Policy offers small businesses special incentives to come into compliance voluntarily.

### EPA's Audit Policy

[www2.epa.gov/compliance/epas-audit-policy](http://www2.epa.gov/compliance/epas-audit-policy)

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

### Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

### Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

*EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.*